

**REMARKS:**

In accordance with the foregoing, claims 1, 2, 4-7, and 9-11 have been amended for clarification, claims 3 and 8 have been cancelled, and claims 12-18 have been added. No new matter has been added. Thus, claims 1, 2, 4-7, and 9-18 are pending and under consideration.

**OBJECTION TO THE ABSTRACT:**

At item 3 of the outstanding Office Action, the Examiner objects to the abstract section of the present application for failing to use proper language. The abstract is amended to comply with the format for an abstract of the disclosure. Accordingly, withdrawal of the objection is respectfully requested.

**REJECTION UNDER 35 U.S.C. §112¶2:**

At item 6 of the Office Action, the Examiner objects to claims 1-11 as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Specifically, the Examiner stated that claims 1, 6, and 11 recite the “said displayed status” feature that was not previously recited, and claims 2-5 and 7-10 depend therefrom.

Claims 1, 6, 11 have been amended to clarify that the “said displayed status” feature refers to the displayed menu status using a graphical user interface definition file for the application of the original operating system environment. Accordingly, withdrawal of the rejection is respectfully requested.

**REJECTION UNDER 35 U.S.C. §102 (e):**

In item 7 of the outstanding Office Action, claims 1-4, 6-9 and 11 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent 5,956,029 ('029).

'029 discusses a user interface conversion method and apparatus of converting a picture interface of a program running on an operating system (OS) with a graphical user interface to generate and provide a new picture interface in accordance with different operation environments and different users.

The present application discloses a method and apparatus for transferring an application from an original operating system to a target operating system without requiring manual transfer.

The Examiner appears to imply that all the features of the present application are discussed in the '029 user interface conversion apparatus and method. In '029, when a picture drawing event occurs using an application program running on an OS, the event acquiring

section acquires the picture drawing event, and transfers the information to the picture information acquiring section (see, column 4, lines 43-50 of '029). Then, a target point extracting section refers to target point information in a target point information storage section and extracts the target point picture information from the picture information stored in the picture information storage section (see, column 4, line 65 through column 5, line 14 of '029). Accordingly, based on the extracted target point picture information (see, column 5, lines 15-17 of '029), the '029 attribute conversion executing section performs the conversion, for example, by changing an interactive component such as a button to another button display or changing the size and position of the button (see, column 5, lines 34-39 of '029). This means that the '029 conversion adjusts the display of a user interface within the same OS to accommodate different operation environments and different users.

The present application transfers "an application from an original operating system environment to another target operating system environment" (see, claims 1, 6, and 11 of the present application), thereby allowing the application to run in various operating systems. This is achieved by "displaying a menu status using a GUI definition file for the application of said original operating system", and "creating another GUI definition file for the application in said target operating system" where the created menus are displayed in the target operating system environment by using the created GUI definition file of the target OS (see, claims 1, 6, and 11 of the present application). This is unlike the '029 apparatus that merely modifies the display of a user interface within the same OS because the present invention transfers an application between two different operating systems, for example, between UNIX to Windows NT.

Further, the '029 apparatus converts the application picture developed in an OS into various picture interfaces without changing an original application program (see, column 1, lines 5-12, column 2, lines 3-9, and FIG. 1 and corresponding text of '029). Thus, the '029 apparatus executes the conversion of the picture within the same application program and OS. However, the present application rewrites "an interface layer of the application in said original operating system environment so that said another GUI definition file is read in said target operating system environment" (see, claims 2 and 7 of the present application). This allows the present invention to display the information in the target OS environment by allowing the original OS and target OS to communicate with each other.

Therefore, the features of the present application are not anticipated by the '029 apparatus that merely modifies a user interface running in an OS to accommodate different users and environments. Accordingly, withdrawal of the rejection is respectfully requested.

**REJECTION UNDER 35 U.S.C. § 103 (a):**

In item 9 of the outstanding Office Action, claims 5 and 10 were rejected under 35 U.S.C. § 103(a) as being unpatentable over '029.

The Examiner acknowledges that '029 does not disclose that the original environment is a UNIX OS and the target environment is a Windows OS, however the Examiner states that it would have been obvious to use the '029 conversion method to produce cross-platform GUI application. The '029 apparatus discusses execution of a conversion of an application picture developed in an OS into various picture interfaces (see, column 1, lines 5-17 of '029), and does not teach or suggest the transfer of an application where the "original operating system environment is a UNIX operating system and wherein said target operating system environment is a Windows operating system" (see, claims 5 and 10 of the present application). The conversion operation of '029 is directed to modifying the application picture in a single OS based on operating environments. For example, converting captions and lists into bit maps when use of the program is by a juvenile user (see, column 10, lines 21-23 of '029), converting a scroll bar to voice components when use of the program by a visually handicapped user (see, column 10, lines 27-29 of '029), etc.

The burden of establishing a prima facie case of obviousness based upon the prior art lies with the Examiner. In re Fritch, 23 U.S.P.Q. 2d 1780, 1783 (Fed. Cir. 1992). According to In re Fritch, the Examiner "... can satisfy this burden only by showing some objective teaching in the prior art or that knowledge generally available to one of ordinary skill in the art would lead that individual to combine the relevant teachings of the references." Since '029 does not disclose a method and apparatus for transferring an application from an original OS to a target OS without requiring manual transfer, the '029 apparatus that merely modifies a picture interface of a program based on different operating environment and users does not teach or suggest features of the present application.

Accordingly, withdrawal of the rejection is requested.

**NEW CLAIMS:**

New claims 12-17 have been added to emphasize an operation transfer method and system of the present invention that includes "rewriting a GUI information of a GUI definition file for the application of said original operating system environment to another GUI information of another GUI definition file for the application in said target operating system environment" to allow a created GUI picture to be displayed, and "replacing an original operating system dependent portion of an interface layer of the application with a target operating system

dependent portion of an interface layer" (see, new claims 12 and 15). The '029 apparatus does not teach or suggest neither replacing an original operating system dependent portion nor rewriting a GUI information of a GUI definition file for the application.

Further, new claim 18 has been added to highlight an aspect of the invention that enables transfer of an application from a first OS to a second OS by "automatically creating and displaying another graphical user interface definition file for the application in the second operating system " where "graphical user interface files of the application in the first operating system is added to the created graphical user interface definition file for the application in the second operating system". This allows the application program to be easily used across various operating systems, eliminating the need to rewrite all application dependent data to the new OS, and the need to implement a program to emulate another OS.

**CONCLUSION:**

In accordance with the foregoing, the abstract and claims 1, 2, 4-7, and 9-11 have been amended, claims 3 and 8 have been cancelled, and claims 12-18 added. Thus, claims 1, 2, 4-7, 10-18 are pending and under consideration.

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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